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9 **UNITED STATES DISTRICT COURT**  
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 **CARRIE COUSER, individually**  
12 **and on behalf of all other**  
13 **similarly situated,**

14 Plaintiffs,

15 v.

16 **COMENITY BANK,**

17 Defendant.  
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**Case No.: 12-CV-02484-MMA-BGS**

**DECLARATION OF CARRIE  
COUSER IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
ATTORNEYS' FEES, COSTS,  
AND INCENTIVE AWARD**

**Date:** April 20, 2015

**Time:** 2:30 p.m.

**Place:** Courtroom 3A

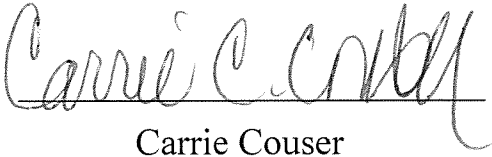
**Judge:** Hon. Michael M. Anello

**DECLARATION OF CARRIE COUSER**

I, CARRIE COUSER, declare:

1. I am the named Plaintiff in this above-captioned class action against defendant COMENITY BANK (the "Defendant").
2. I am filing this declaration in support of Plaintiff's Motion For Attorneys' Fees, Costs, and Incentive Award.
3. I, through my counsel, commenced this action on October 12, 2012 by filing a putative class action complaint asserting causes of action for: (1) negligent violation of Section 227(b)(3)(B) of the Telephone Consumer Protection Act ("TCPA"), codified at 47 U.S.C. § 227 et seq., and (2) willful violation of Section 227(b)(3)(B) of the TCPA (the "Complaint").
4. I have participated throughout this litigation with the belief that I was helping all other persons similarly situated to me. Before filing the Complaint, I met with my attorneys for the initial consultation, participated in calls regarding fact-finding efforts with my attorneys, made myself available telephonically during the three days of mediation which followed, submitted a declaration in support of preliminary approval of class action settlement, and now submit this declaration in support of the motion or attorneys' fees, costs and incentive award.
5. I have reviewed the Settlement Agreement that followed the mediation and have discussed the settlement with my counsel. I believe the settlement is fair, reasonable, and provides excellent benefits to the Class.
6. I support Class Counsel's request for attorneys' fees and costs to compensate them for their contingency based representation and substantial outlaying of time and expenses. I also respectfully request an incentive payment of \$1,500 to compensate me for my time and effort in litigating this action and bringing it to the current posture. I understand that my request for an incentive payment of \$1,500 requires approval by the Court.

1 I declare under penalty of perjury under the laws of California and the  
2 United States of America that the foregoing is true and correct, and that this  
3 declaration was executed on December 22, 2014.

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7 Carrie Couser

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12 KAZEROUNI LAW GROUP, APC  
13 245 FISCHER AVENUE, UNIT D1  
14 COSTA MESA, CA 92626  
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